

## **REMARKS**

In the Official Action mailed on **6 June 2006**, the Examiner reviewed claims 1-62. Claim 58 was objected to because of informalities. Claims 1-62 were rejected under 35 U.S.C. §101 because the claims are directed to non-statutory subject matter. Claims 1-3, 6, 21-23, 26, 41-43, 46, and 61-62 were rejected under 35 U.S.C. §102(e) as being anticipated by Dillion et al (USPub 2003/0088562, hereinafter "Dillion").

### **Objections to the claims**

Claim 58 was objected to because of informalities.

Applicant has amended claim 58 to depend from claim 57.

### **Rejections under 35 U.S.C. §101**

Claims 1-62 were rejected because the claims are directed to non-statutory subject matter.

Applicant has amended independent claims 1, 21, and 41 to include the limitation of "wherein the set of components is subsequently used to generate a response to a query from a user." This constitutes a transformation of data external to the computer and is thus patentable subject matter. These amendments find support in paragraphs [0079] and [00201] of the instant application. Applicant has amended independent claims 21 and 61 to clarify that the computer readable storage medium is a tangible medium, hence patentable. These amendments find support in paragraph [0055] of the instant application.

### **Rejections under 35 U.S.C. §102(e)**

Independent claims 1, 21, 41, and 61 were as being anticipated by Dillion. Applicant respectfully points out that Dillion teaches determining training sets of

data by doing a **frequency analysis** on the words in a document (see Dillion, paragraph [0056]).

In contrast, the present invention forms candidate clusters using conceptually related words, wherein the conceptually related words are **words that relate to a single idea** (see paragraphs [0059]-[0067] of the instant application). This is beneficial because it more accurately represents the idea that a searcher has in mind when initiating a search. There is nothing within Dillion, either explicit or implicit, which suggests forming candidate clusters using conceptually related words, wherein the conceptually related words are words that relate to a single idea.


Accordingly, Applicant has amended independent claims 1, 21, 41, and 61 to clarify that the present invention forms candidate clusters using conceptually related words, wherein the conceptually related words are words that relate to a single idea. These amendments find support in paragraphs [0059]-[0067] of the instant application.

Hence, Applicant respectfully submits that independent claims 1, 21, 41, and 61 as presently amended are in condition for allowance. Applicant also submits that claims 2-20, which depend upon claim 1, claims 22-40, which depend upon claim 21, claims 42-60, which depend upon claim 41, and claim 62, which depends upon claim 61, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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